

FY17 to FY18 Mid-Year Analysis for Regional Evaluation

6/19/18

PURPOSE

This document provides an in-depth analysis of the changes in enforcement outputs (initiations, conclusions and inspections) between mid-year FY 17 and mid-year FY 18 by programs and region. The detailed tables and charts supporting this short summary follow. Per the June 19, 2018 email from OECA's Deputy Assistant Administrator, we have asked the regions to respond to three requests: 1) verify data accuracy, 2) provide a narrative explanation for output changes of greater than or less than 10%, and 3) provide projections for your FY2018 end of year activities (see email for details).

CAVEAT

Regions are expected to enter data into ICIS within 10 business days of the event. The FY17 mid-year data should be of very high quality as the regions had 7 months after March 31, 2017 to complete and certify their data. The FY18 -mid-year data should be of good quality as the regions have had two months to complete data entry after mid-year close (March 31, 2018), but the end of year data certification process that prompts data quality reviews does not occur until October 2018.

INITIATIONS

- Between MY FY 17 and MY FY 18, there was a 24% decline in the number of initiations among all programs
- Between MY FY 17 and MY FY 18, every enforcement program had a decline in the number of initiations except SDWA PWS (65% increase).¹
- The major enforcement programs saw declines as follows:
 - o CAA Stationary Source = -52%
 - o CWA NPDES = -36%
 - o RCRA HW = -17%
- From MY FY 17 to MY FY 18, every region had a decline in the number of initiations
 - o Regions 2, 6 and 9 had declines of less than 10%
 - o Regions 3 (40%), 4 (49%), and 8 (53%) had declines of at least 40%
- Overall there was a 28% decline in the number of civil judicial referrals from MY FY 17 to FY 18

CONCLUSIONS

- From MY FY 17 and MY FY 18, there was a 23% decline in conclusions among all programs which we expect would lead to a decline in outcomes, such as penalty dollars, injunctive relief and environmental benefits (assuming there is no surprise huge case).
- From MY FY 17 and MY FY 18, every enforcement program had a decline in conclusions except SDWA PWS (50% increase)
 - o The SDWA PWS increase is not consistent among all regions
- The major enforcement programs saw declines as follows:

¹ There was a slight increase in PWS inspections from FY2016 to FY2017, which may partially explain the increase in enforcement actions in MY FY2018.

- CAA Stationary Source = -38%
- CWA NPDES = -38%
- RCRA HW = -23%
- Between MY FY 17 to MY FY 18, Regions 2 and 9 remained stable in the number of conclusions, while every other region had a decline of at least 14%
 - Regions 1 (42%), 3 (38%), and 4 (48%) had declines of at least 38%
- Overall there was a 21% decline in the number of civil judicial conclusions from FY 17 to FY 18

INSPECTIONS

- Between MY FY 17 and MY FY 18, there was a 33% decline in the number of inspections among all programs (MY FY 17 = 3,747: MY FY 18 = 2,508)
- From MY FY 17 to MY FY 18, every region had a decline of at least 15% in the number of inspections
- Between MY FY 17 and MY FY 18, CAA Stationary Source Partial Compliance Evaluations (PCEs) had the largest drop in number of inspections (-469, or -68% decline)

ATTACHMENTS

Charts:

1. Total Initiations by year: Mid-Year to Mid-Year Comparison
2. Total Initiations by Region: Mid-Year to Mid-Year Comparison
3. Civil Judicial referrals by Region: Mid-Year to Mid-Year Comparison
4. Total Conclusions by Year: Mid-Year to Mid-Year Comparison
5. Total Conclusions by Region: Mid-Year to Mid-Year Comparison
6. Civil Judicial Conclusions by Region: Mid-Year to Mid-Year Comparison
7. Inspections by Year: Mid-Year to Mid-Year Comparison
8. Inspections by Region: Mid-Year to Mid-Year Comparison

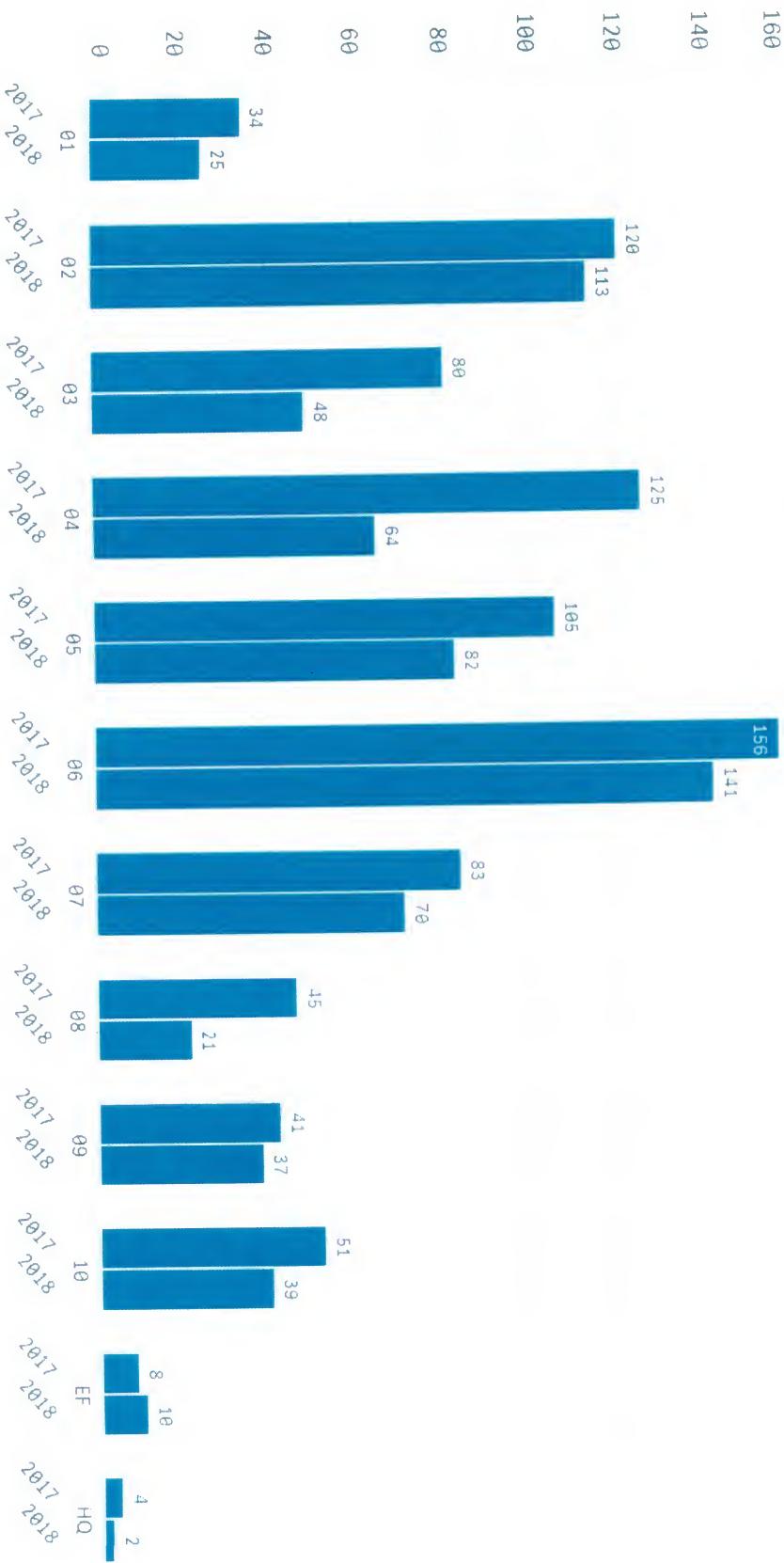
Tables:

1. National Initiations
2. National Conclusions
3. Conclusions by Region
4. National Inspections
5. Inspections by Region

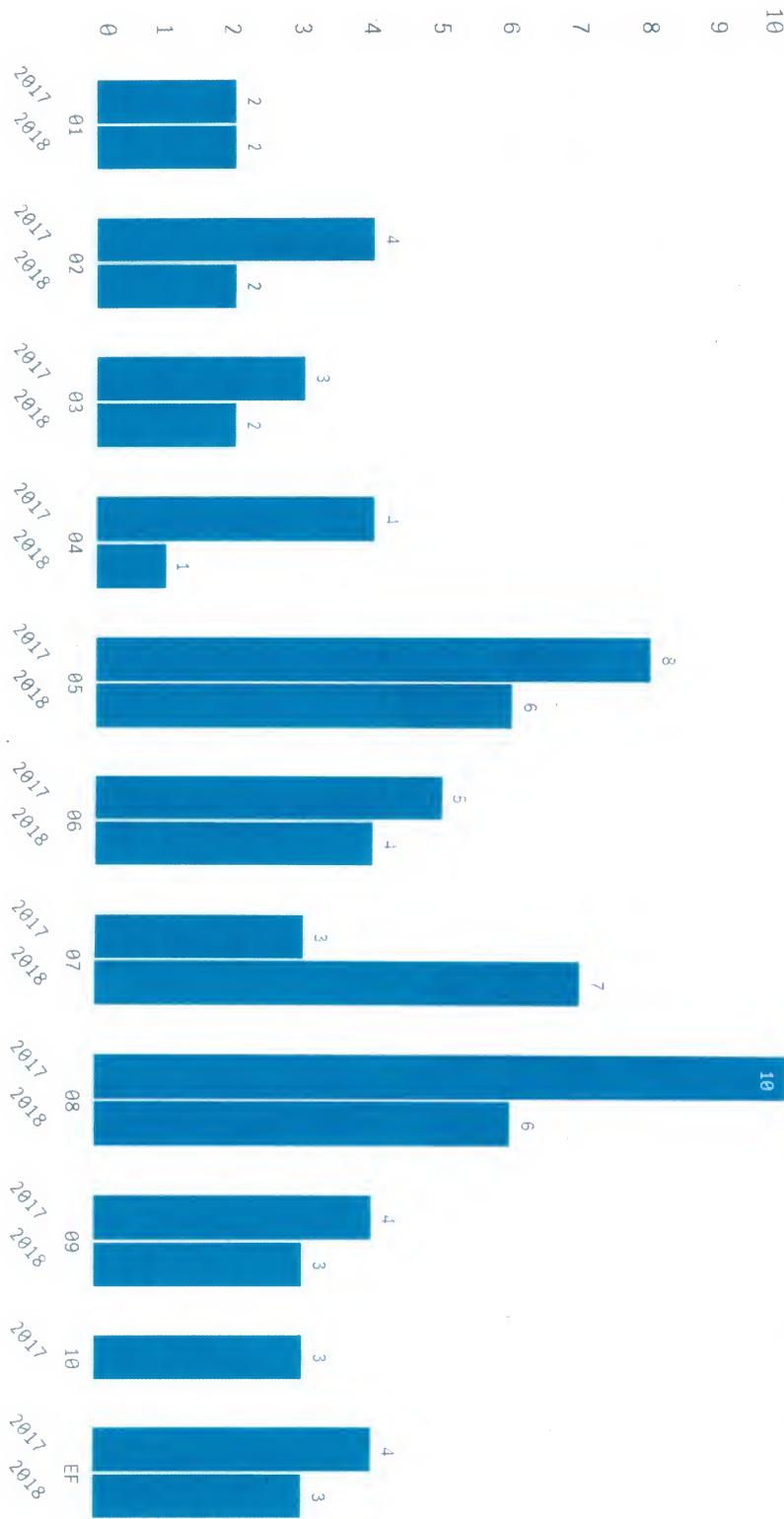
Total Initiations by Year: Mid-Year to Mid-Year Comparison



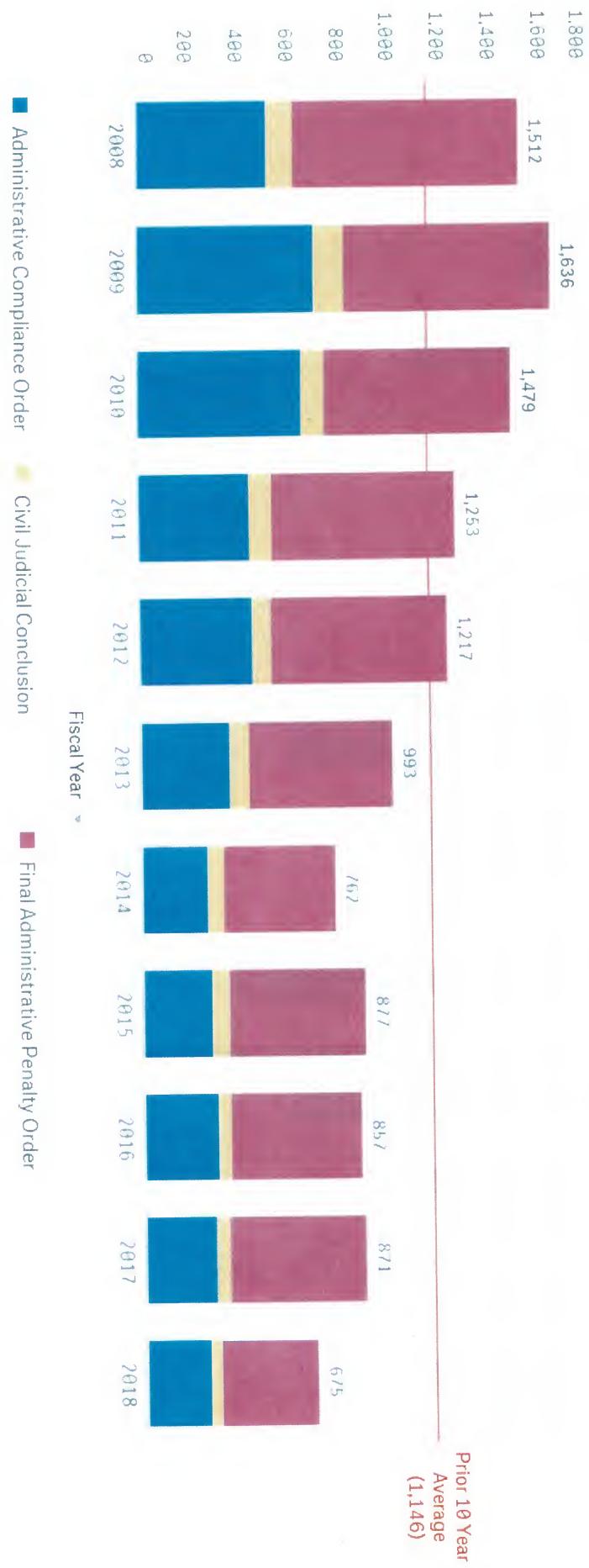
Total Initiations by Region: Mid-Year to Mid-Year Comparison



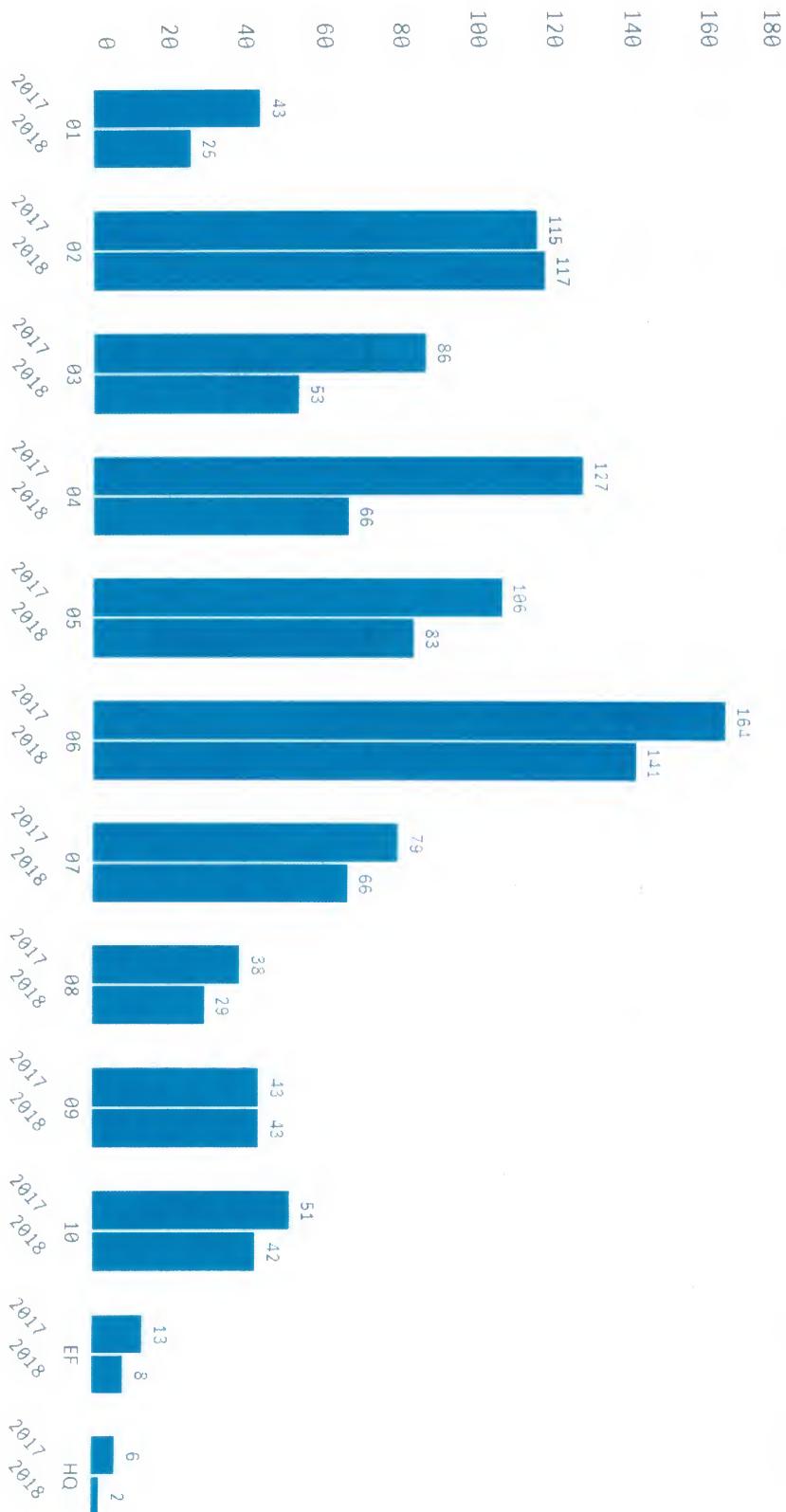
Civil Judicial Referrals by Region: Mid-Year to Mid-Year Comparison



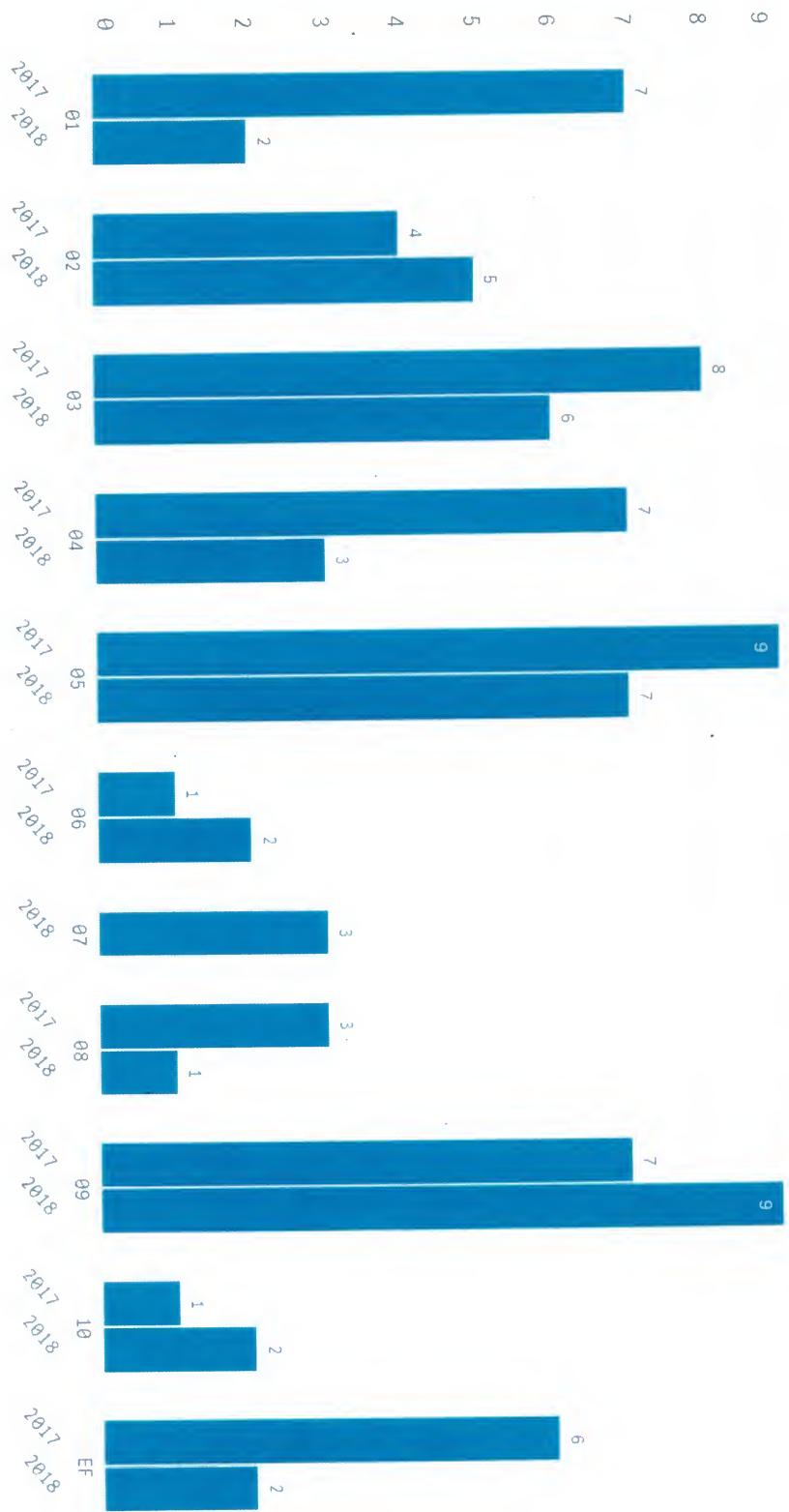
Total Conclusions by Year: Mid-Year to Mid-Year Comparison



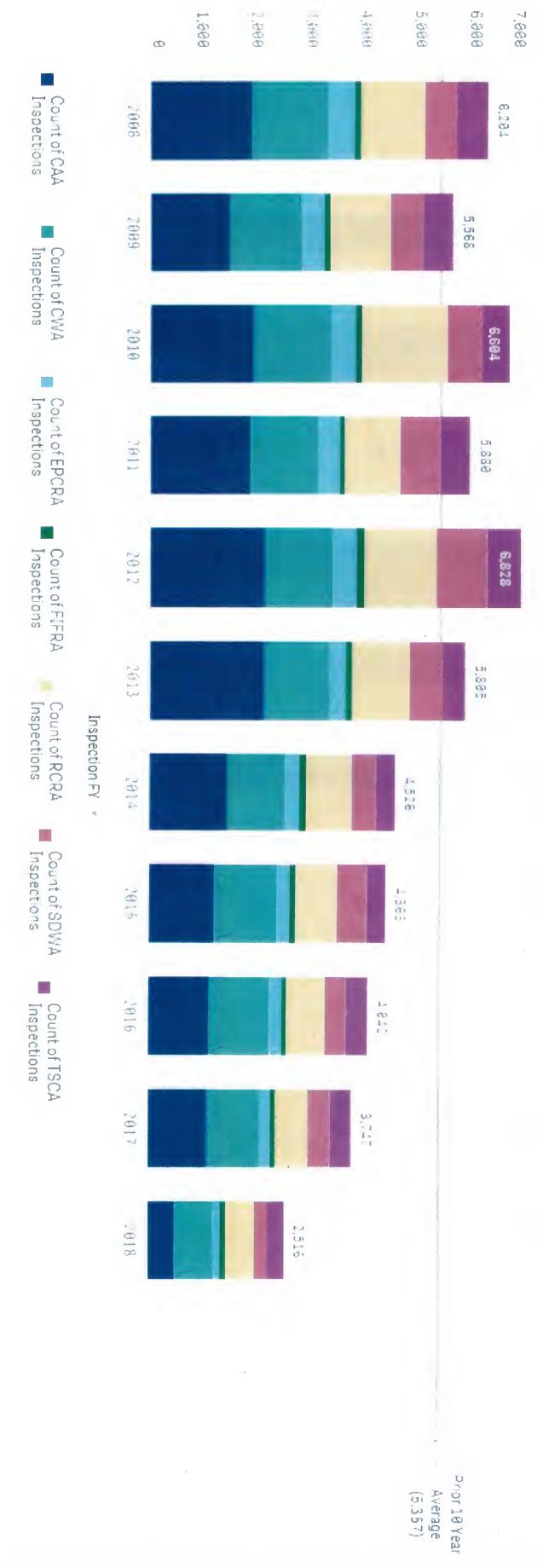
Total Conclusions by Region: Mid-Year to Mid-Year Comparison



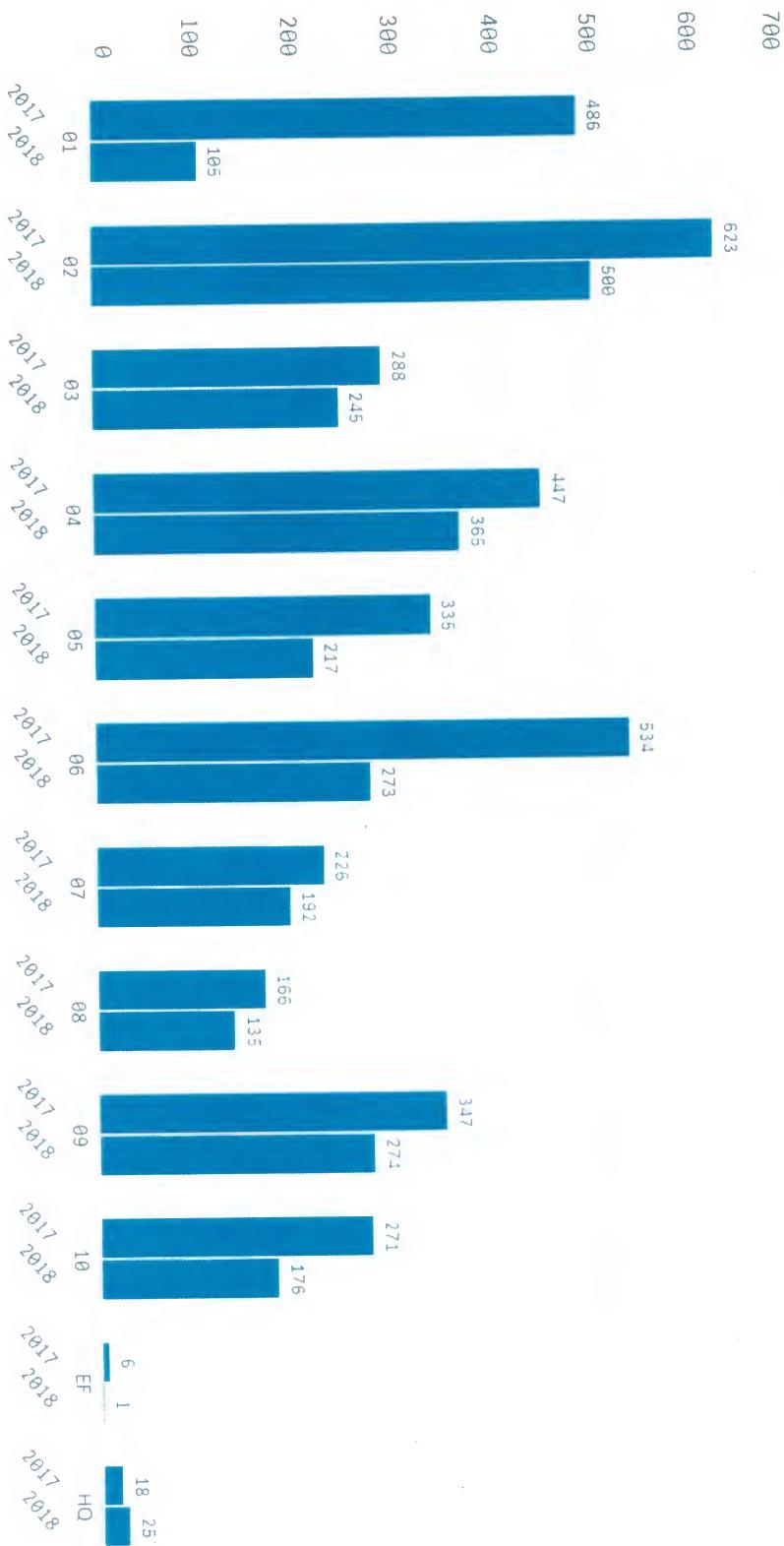
Civil Judicial Conclusions by Region: Mid-Year to Mid-Year Comparison



Inspections by Year: Mid-Year to Mid-Year Comparison



Inspections by Region: Mid-Year to Mid-Year Comparison



Total Enforcement Initiations Change (Judicial & Administrative) Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program				
Programs	2017	2018	Change MY FY17 to MY FY 18	Percent Change MY FY17 to MY FY18
CERCLA	66	61	-5	-7.58%
CWA 404	23	19	-4	-17.39%
CAA Stationary Source	69	33	-36	-52.17%
CWA NPDES	179	115	-64	-35.75%
RCRA HW	53	44	-9	-16.98%
CWA 311	57	43	-14	-24.56%
EPCRA 313	20	13	-7	-35.00%
FIFRA	76	47	-29	-38.16%
TSCA	53	38	-15	-28.30%
CAA 112r	80	56	-24	-30.00%
SDWA PWS	49	81	32	65.31%
EPCRA non 313	30	22	-8	-26.67%
RCRA UST	63	54	-9	-14.29%
RCRA CA	3	0	-3	-100.00%
CAA Mobile Source	20	18	-2	-10.00%
SDWA UIC	10	8	-2	-20.00%
APPS Mobile Source	1	0	-1	-100.00%
Totals	852	652	-200	-23.47%

Total Enforcement Initiations Change (Judicial & Administrative) Mid-Year FY 17 to Mid-Yer FY 18 by Region				
Region	2017	2018	Change MY FY17 to MY FY 18	Percent Change MY FY17 to MY FY18
Region 1	34	25	-9	-26.47%
Region 2	120	113	-7	-5.83%
Region 3	80	48	-32	-40.00%
Region 4	125	64	-61	-48.80%
Region 5	105	82	-23	-21.90%
Region 6	156	141	-15	-9.62%
Region 7	83	70	-13	-15.66%
Region 8	45	21	-24	-53.33%
Region 9	41	37	-4	-9.76%
Region 10	51	39	-12	-23.53%
HQ	12	12	0	0.00%
Totals	852	652	-200	-23.47%

Administrative Enforcement Initiations Change Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program				
Programs	2017	2018	Change MY FY17 to MY FY 18	Percent Change MY FY17 to MY FY18
CERCLA	47	48	1	2.13%
CWA 404	22	16	-6	-27.27%
CAA Stationary Source	57	27	-30	-52.63%
CWA NPDES	174	113	-61	-35.06%
RCRA HW	52	41	-11	-21.15%
CWA 311	55	42	-13	-23.64%
EPCRA 313	20	13	-7	-35.00%
FIFRA	76	47	-29	-38.16%
TSCA	53	37	-16	-30.19%
CAA 112r	76	55	-21	-27.63%
SDWA PWS	48	81	33	68.75%
EPCRA non 313	30	22	-8	-26.67%
RCRA UST	63	54	-9	-14.29%
RCRA CA	2	0	-2	-100.00%
CAA Mobile Source	16	15	-1	-6.25%
SDWA UIC	10	5	-5	-50.00%
APPS Mobile Source	1	0	-1	-100.00%
Totals	802	616	-186	-23.19%

Administrative Enforcement Initiations Change Mid-Year FY 17 to Mid-Yer FY 18 by Region				
Region	2017	2018	Change MY FY17 to MY FY 18	Percent Change MY FY17 to MY FY18
Region 1	32	23	-9	-28.13%
Region 2	116	111	-5	-4.31%
Region 3	77	46	-31	-40.26%
Region 4	121	63	-58	-47.93%
Region 5	97	76	-21	-21.65%
Region 6	151	137	-14	-9.27%
Region 7	80	63	-17	-21.25%
Region 8	35	15	-20	-57.14%
Region 9	37	34	-3	-8.11%
Region 10	48	39	-9	-18.75%
HQ	8	9	1	12.50%
Totals	802	616	-186	-23.19%

Civil Judicial Referrals Change Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program				
Programs	2017	2018	Change MY FY17 to MY FY 18	Percent Change MY FY17 to MY FY18
CERCLA	19	13	-6	-31.58%
CWA 404	1	3	2	200.00%
CAA Stationary Source	12	6	-6	-50.00%
CWA NPDES	5	2	-3	-60.00%
RCRA HW	1	3	2	200.00%
CWA 311	2	1	-1	-50.00%
EPCRA 313	0	0	0	-
FIFRA	0	0	0	-
TSCA	0	1	1	100.00%
CAA 112r	4	1	-3	100.00%
SDWA PWS	1	0	-1	-100.00%
EPCRA non 313	0	0	0	-
RCRA UST	0	0	0	-
RCRA CA	1	0	-1	-100.00%
CAA Mobile Source	4	3	-1	-25.00%
SDWA UIC	0	3	3	100.00%
APPS Mobile Source	0	0	0	-
Totals	50	36	-14	-28.00%

Civil Judicial Referrals Change Mid-Year FY 17 to Mid-Yer FY 18 by Region				
Region	2017	2018	Change MY FY17 to MY FY 18	Percent Change MY FY17 to MY FY18
Region 1	2	2	0	0.00%
Region 2	4	2	-2	-50.00%
Region 3	3	2	-1	-33.33%
Region 4	4	1	-3	-75.00%
Region 5	8	6	-2	-25.00%
Region 6	5	4	-1	-20.00%
Region 7	3	7	4	133.33%
Region 8	10	6	-4	-40.00%
Region 9	4	3	-1	-25.00%
Region 10	3	0	-3	-100.00%
HQ	4	3	-1	-25.00%
Totals	50	36	-14	-28.00%

Total Enforcement Conclusions Change (Judicial & Administrative) Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program				
Programs	2017	2018	Change MY FY17 to MY FY18	Percent Change MY FY17 to MY FY18
CERCLA	67	66	-1	-1.49%
CWA 404	26	15	-11	-42.31%
CAA Stationary Source	64	40	-24	-37.50%
CWA NPDES	189	118	-71	-37.57%
RCRA HW	57	44	-13	-22.81%
CWA 311	55	43	-12	-21.82%
EPCRA 313	22	13	-9	-40.91%
FIFRA	77	54	-23	-29.87%
TSCA	53	43	-10	-18.87%
CAA 112r	76	55	-21	-27.63%
SDWA PWS	54	81	27	50.00%
EPCRA non 313	30	23	-7	-23.33%
RCRA UST	65	57	-8	-12.31%
RCRA CA	2	0	-2	-100.00%
CAA Mobile Source	25	16	-9	-36.00%
SDWA UIC	8	7	-1	-12.50%
APPS Mobile Source	1	0	-1	-100.00%
Totals	871	675	-196	-22.50%

Total Enforcement Conclusions Change (Judicial & Administrative) Mid-Year FY 17 to Mid-Yer FY 18 by Region				
Region	2017	2018	Change MY FY17 to MY FY18	Percent Change MY FY17 to MY FY18
Region 1	43	25	-18	-41.86%
Region 2	115	117	2	1.74%
Region 3	86	53	-33	-38.37%
Region 4	127	66	-61	-48.03%
Region 5	106	83	-23	-21.70%
Region 6	164	141	-23	-14.02%
Region 7	79	66	-13	-16.46%
Region 8	38	29	-9	-23.68%
Region 9	43	43	0	0.00%
Region 10	51	42	-9	-17.65%
HQ	19	10	-9	-47.37%
Totals	871	675	-196	-22.50%

Administrative Enforcement Conclusions Change Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program				
Programs	2017	2018	Change MY FY17 to MY FY18	Percent Change MY FY17 to MY FY18
CERCLA	47	48	1	2.13%
CWA 404	22	14	-8	-36.36%
CAA Stationary Source	55	28	-27	-49.09%
CWA NPDES	180	114	-66	-36.67%
RCRA HW	55	42	-13	-23.64%
CWA 311	54	43	-11	-20.37%
EPCRA 313	22	13	-9	-40.91%
FIFRA	77	54	-23	-29.87%
TSCA	52	43	-9	-17.31%
CAA 112r	76	54	-22	-28.95%
SDWA PWS	54	81	27	50.00%
EPCRA non 313	30	23	-7	-23.33%
RCRA UST	64	55	-9	-14.06%
RCRA CA	2	0	-2	-100.00%
CAA Mobile Source	19	14	-5	-26.32%
SDWA UIC	8	7	-1	-12.50%
APPS Mobile Source	1	0	-1	-100.00%
Totals	818	633	-185	-22.62%

Administrative Enforcement Conclusions Change Mid-Year FY 17 to Mid-Yer FY 18 by Region				
Region	2017	2018	Change MY FY17 to MY FY18	Percent Change MY FY17 to MY FY18
Region 1	36	23	-13	-36.11%
Region 2	111	112	1	0.90%
Region 3	78	47	-31	-39.74%
Region 4	120	63	-57	-47.50%
Region 5	97	76	-21	-21.65%
Region 6	163	139	-24	-14.72%
Region 7	79	63	-16	-20.25%
Region 8	35	28	-7	-20.00%
Region 9	36	34	-2	-5.56%
Region 10	50	40	-10	-20.00%
HQ	13	8	-5	-38.46%
Totals	818	633	-185	-22.62%

Judicial Enforcement Conclusions Change Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program				
Programs	2017	2018	Change MY FY17 to MY FY18	Percent Change MY FY17 to MY FY18
CERCLA	20	18	-2	-10.00%
CWA 404	4	1	-3	-75.00%
CAA Stationary Source	9	12	3	33.33%
CWA NPDES	9	4	-5	-55.56%
RCRA HW	2	2	0	0.00%
CWA 311	1	0	-1	-100.00%
EPCRA 313	0	0	0	-
FIFRA	0	0	0	-
TSCA	1	0	-1	-100.00%
CAA 112r	0	1	1	100.00%
SDWA PWS	0	0	0	-
EPCRA non 313	0	0	0	-
RCRA UST	1	2	1	100.00%
RCRA CA	0	0	0	-
CAA Mobile Source	6	2	-4	-66.67%
SDWA UIC	0	0	0	-
APPS Mobile Source	0	0	0	-
Totals	53	42	-11	-20.75%

Judicial Enforcement Conclusions Change Mid-Year FY 17 to Mid-Yer FY 18 by Region				
Region	2017	2018	Change MY FY17 to MY FY18	Percent Change MY FY17 to MY FY18
Region 1	7	2	-5	-71.43%
Region 2	4	5	1	25.00%
Region 3	8	6	-2	-25.00%
Region 4	7	3	-4	-57.14%
Region 5	9	7	-2	-22.22%
Region 6	1	2	1	100.00%
Region 7	0	3	3	100.00%
Region 8	3	1	-2	-66.67%
Region 9	7	9	2	28.57%
Region 10	1	2	1	100.00%
HQ	6	2	-4	-66.67%
Totals	53	42	-11	-20.75%

Total Enforcement Conclusions Change (Judicial & Administrative)

Total Enforcement Conclusions Change (Judicial & Administrative)											
Programs	Mid-Year FY17 to Mid-Year FY18 by Program										
	Region 1			Region 2			Region 3				
	2017	2018	Percent Change MY FY17 to MY FY18	2017	2018	Percent Change MY FY17 to MY FY18	2017	2018	Percent Change MY FY17 to MY FY18		
CERCLA	2	4	100.00%	9	13	44.44%	9	4	-55.56%		
CWA 404	1	3	100.00%	2	0	-100.00%	5	3	-40.00%		
CAA Stationary Source	3	5	66.67%	1	1	0.00%	5	5	0.00%		
CWA NPDES	10	6	-40.00%	46	26	-43.48%	10	7	-30.00%		
KCRA HW	3	0	-100.00%	2	2	0.00%	7	5	-28.57%		
CWA 311	2	2	0.00%	4	0	-100.00%	5	5	0.00%		
EPCRA 313	2	1	-50.00%	0	0	-100.00%	1	3	200.00%		
FIFRA	5	0	-100.00%	2	0	-100.00%	7	5	-28.57%		
TSCA	4	4	0.00%	6	4	-33.33%	4	8	100.00%		
CAA 112r	4	1	-75.00%	0	0	-	11	6	-45.45%		
SOWWA PWMS	0	0	-	11	44	300.00%	1	0	-100.00%		
EPCRA non 313	1	0	-100.00%	0	0	-	6	2	-66.67%		
KCRA UST	4	1	-75.00%	31	27	-12.90%	2	2	-66.67%		
RCRA CA	0	0	-	0	0	-	0	0	-		
CAA Mobile Source	0	0	-	1	0	-100.00%	0	0	-100.00%		
SDWWA UIC	0	0	-	0	0	-	5	0	-100.00%		
APPS Mobile Source	0	0	-	0	0	-	0	0	-100.00%		
Totals	43	25	-41.85%	115	117	1.74%	86	53	-38.37%		
Region 6											
Percent Change 2017 to 2018			Percent Change MY FY17 to MY FY18			Percent Change 2017 to 2018			Percent Change MY FY17 to MY FY18		
CERCLA	2	2	0.00%	3	5	66.67%	4	5	25.00%	10	12
CWA 404	3	1	-65.67%	3	2	-33.33%	3	0	-100.00%	2	0
CAA Stationary Source	4	2	-50.00%	0	1	100.00%	2	2	0.00%	5	2
CWA NPDES	58	39	-32.76%	14	15	7.18%	8	3	-62.50%	6	5
KCRA HW	23	19	-17.39%	4	5	50.00%	1	0	-100.00%	1	1
CWA 311	20	17	-15.00%	21	7	-66.67%	2	3	-50.00%	5	1
EPCRA 313	4	6	50.00%	0	0	-	0	0	400.00%	1	0
FIFRA	3	3	0.00%	11	4	-63.64%	3	4	33.33%	2	10
RCRA CA	0	0	-	12	10	-16.67%	4	3	-25.00%	3	1
CAA 112r	23	17	-26.09%	9	12	33.33%	0	0	-100.00%	2	5
SDWWA PWMS	24	29	20.83%	1	0	-100.00%	10	7	-30.00%	2	150.00%
EPCRA non 313	0	0	-	0	1	100.00%	1	1	100.00%	0	0
KCRA UST	0	0	-	1	3	200.00%	0	1	100.00%	2	4
RCCA CA	0	0	-	0	0	-	0	0	-	14	9
CAA Mobile Source	0	0	-	0	0	-	0	0	-	0	0
SDWWA UIC	0	6	100.00%	0	0	-	1	0	-100.00%	1	1
APPS Mobile Source	0	0	-	0	0	-	0	0	-	0	0
Totals	164	141	-14.02%	79	66	-16.46%	38	29	-23.68%	43	43
Region 7											
Percent Change 2017 to 2018			Percent Change MY FY17 to MY FY18			Percent Change 2017 to 2018			Percent Change MY FY17 to MY FY18		
CERCLA	2	2	0.00%	3	5	66.67%	4	5	25.00%	10	12
CWA 404	3	1	-65.67%	3	2	-33.33%	3	0	-100.00%	2	0
CAA Stationary Source	4	2	-50.00%	0	1	100.00%	2	2	0.00%	5	2
CWA NPDES	58	39	-32.76%	14	15	7.18%	8	3	-62.50%	6	5
KCRA HW	23	19	-17.39%	4	5	50.00%	1	0	-100.00%	1	1
CWA 311	20	17	-15.00%	21	7	-66.67%	2	3	-50.00%	5	1
EPCRA 313	4	6	50.00%	0	0	-	0	0	400.00%	1	0
FIFRA	3	3	0.00%	11	4	-63.64%	3	4	33.33%	2	10
RCRA CA	0	0	-	12	10	-16.67%	4	3	-25.00%	3	1
CAA 112r	23	17	-26.09%	9	12	33.33%	0	0	-100.00%	2	5
SDWWA PWMS	24	29	20.83%	1	0	-100.00%	10	7	-30.00%	2	150.00%
EPCRA non 313	0	0	-	0	1	100.00%	1	1	100.00%	0	0
KCRA UST	0	0	-	1	3	200.00%	0	1	100.00%	2	4
RCCA CA	0	0	-	0	0	-	0	0	-	14	9
CAA Mobile Source	0	0	-	0	0	-	0	0	-	0	0
SDWWA UIC	0	6	100.00%	0	0	-	1	0	-100.00%	1	1
APPS Mobile Source	0	0	-	0	0	-	0	0	-	0	0
Totals	164	141	-14.02%	79	66	-16.46%	38	29	-23.68%	43	43
Region 8											
Percent Change 2017 to 2018			Percent Change MY FY17 to MY FY18			Percent Change 2017 to 2018			Percent Change MY FY17 to MY FY18		
CERCLA	2	2	0.00%	3	5	66.67%	4	5	25.00%	10	12
CWA 404	3	1	-65.67%	3	2	-33.33%	3	0	-100.00%	2	0
CAA Stationary Source	4	2	-50.00%	0	1	100.00%	2	2	0.00%	5	2
CWA NPDES	58	39	-32.76%	14	15	7.18%	8	3	-62.50%	6	5
KCRA HW	23	19	-17.39%	4	5	50.00%	1	0	-100.00%	1	1
CWA 311	20	17	-15.00%	21	7	-66.67%	2	3	-50.00%	5	1
EPCRA 313	4	6	50.00%	0	0	-	0	0	400.00%	1	0
FIFRA	3	3	0.00%	11	4	-63.64%	3	4	33.33%	2	10
RCRA CA	0	0	-	12	10	-16.67%	4	3	-25.00%	3	1
CAA 112r	23	17	-26.09%	9	12	33.33%	0	0	-100.00%	2	5
SDWWA PWMS	24	29	20.83%	1	0	-100.00%	10	7	-30.00%	2	150.00%
EPCRA non 313	0	0	-	0	1	100.00%	1	1	100.00%	0	0
KCRA UST	0	0	-	1	3	200.00%	0	1	100.00%	2	4
RCCA CA	0	0	-	0	0	-	0	0	-	14	9
CAA Mobile Source	0	0	-	0	0	-	0	0	-	0	0
SDWWA UIC	0	6	100.00%	0	0	-	1	0	-100.00%	1	1
APPS Mobile Source	0	0	-	0	0	-	0	0	-	0	0
Totals	164	141	-14.02%	79	66	-16.46%	38	29	-23.68%	43	43
Region 9											
Percent Change 2017 to 2018			Percent Change MY FY17 to MY FY18			Percent Change 2017 to 2018			Percent Change MY FY17 to MY FY18		
CERCLA	2	2	0.00%	3	5	66.67%	4	5	25.00%	10	12
CWA 404	3	1	-65.67%	3	2	-33.33%	3	0	-100.00%	2	0
CAA Stationary Source	4	2	-50.00%	0	1	100.00%	2	2	0.00%	5	2
CWA NPDES	58	39	-32.76%	14	15	7.18%	8	3	-62.50%	6	5
KCRA HW	23	19	-17.39%	4	5	50.00%	1	0	-100.00%	1	1
CWA 311	20	17	-15.00%	21	7	-66.67%	2	3	-50.00%	5	1
EPCRA 313	4	6	50.00%	0	0	-	0	0	400.00%	1	0
FIFRA	3	3	0.00%	11	4	-63.64%	3	4	33.33%	2	10
RCRA CA	0	0	-	12	10	-16.67%	4	3	-25.00%	3	1
CAA 112r	23	17	-26.09%	9	12	33.33%	0	0	-100.00%	2	5
SDWWA PWMS	24	29	20.83%	1	0	-100.00%	10	7	-30.00%	2	150.00%
EPCRA non 313	0	0	-	0	1	100.00%	1	1	100.00%	0	0
KCRA UST	0	0	-	1	3	200.00%	0	1	100.00%	2	4
RCCA CA	0	0	-	0	0	-	0	0	-	14	9
CAA Mobile Source	0	0	-	0	0	-	0	0	-	0	0
SDWWA UIC	0	6	100.00%	0	0	-	1	0	-100.00%	1	1
APPS Mobile Source	0	0	-	0	0	-	0	0	-	0	0
Totals	164	141	-14.02%	79	66	-16.46%	38	29	-23.68%	43	43
Region 10											
Percent Change 2017 to 2018			Percent Change MY FY17 to MY FY18			Percent Change 2017 to 2018			Percent Change MY FY17 to MY FY18		
CERCLA	2	2	0.00%	3	5	66.67%	4	5	25.00%	10	12
CWA 404	3	1	-65.67%	3	2	-33.33%	3	0	-100.00%	2	0
CAA Stationary Source	4	2	-50.00%	0	1	100.00%	2	2	0.00%	5	2
CWA NPDES	58	39	-32.76%	14	15	7.18%	8	3	-62.50%	6	5
KCRA HW	23	19	-17.39%	4	5	50.00%	1	0	-100.00%	1	1
CWA 311	20	17	-15.00%	21	7	-66.67%	2	3	-50.00%	5	1
EPCRA 313	4	6	50.00%	0	0	-	0	0	400.00%	1	0
FIFRA	3	3	0.00%	11	4	-63.64%	3	4	33.33%	2	10
RCRA CA	0	0	-	12	10	-16.67%	4	3	-25.00%	3	1
CAA 112r	23	17	-26.09%	9	12	33.33%	0	0	-100.00%	2	5
SDWWA PWMS	24	29	20.83%	1	0	-100.00%	10	7	-30.00%	2	150.00%
EPCRA non 313	0	0	-	0	1	100.00%	1	1	100.00%	0	0
KCRA UST	0	0	-	1	3	200.00%	0	1	100.00%	2	4
RCCA CA	0	0	-	0	0	-	0	0	-	14	9
CAA Mobile Source	0	0	-	0	0	-	0	0	-	0	0
SDWWA UIC	0	6	100.00%	0	0	-	1	0	-100.00%	1	1
APPS Mobile Source	0	0	-	0	0	-	0	0	-	0	0
Totals	164	141	-14.02%	79	66	-16.46%	38	29	-23.68%	43	43

Mid-Year FY 17 to Mid-Year FY 18 National Results by Program				Total Compliance Inspections Change (All Regions)					
Program	2017	2018	Change MY FY17 to MY FY18	Percent Change MY FY17 to MY FY18	Region	2017	2018	Change MY FY17 to MY FY18	Percent Change MY FY17 to MY FY18
CAA 112(r)	181	106	-75	-41.44%	Region 1	486	105	-381	-78.40%
CAA Asbestos Demolition and Renovation	20	4	-16	-80.00%	Region 2	623	500	-123	-19.74%
CAA Mobile Sources	137	99	-38	-27.74%	Region 3	288	245	-43	-14.93%
CAA Stationary Source FCEs	54	62	8	14.81%	Region 4	447	365	-82	-18.34%
CAA Stationary Source PCEs	690	221	-469	-67.97%	Region 5	335	217	-118	-35.22%
CWA 311 FRP	77	54	-23	-29.87%	Region 6	534	273	-261	-48.88%
CWA 311 SPCC	241	125	-116	-48.13%	Region 7	226	192	-34	-15.04%
CWA 311 Spill	3	1	-2	-66.67%	Region 8	166	135	-31	-18.67%
CWA Pretreatment IUS	34	47	13	38.24%	Region 9	347	274	-73	-21.04%
CWA Section 404 Wetlands	70	57	-13	-18.57%	Region 10	271	176	-95	-35.06%
EPCRA 313 Data Quality	10	6	-4	-40.00%	HQ	24	26	2	8.33%
EPCRA 313 non Data Quality	60	48	-12	-20.00%	Totals	3747	2508	-1239	-33.07%

Mid-Year FY 17 to Mid-Year FY 18 by Region			
Region	2017	2018	Change MY FY17 to MY FY18
Region 1	486	105	-381
Region 2	623	500	-123
Region 3	288	245	-43
Region 4	447	365	-82
Region 5	335	217	-118
Region 6	534	273	-261
Region 7	226	192	-34
Region 8	166	135	-31
Region 9	347	274	-73
Region 10	271	176	-95
HQ	24	26	2

Compliance Inspections Change Mid-Year FY 17 to Mid-Year FY 18															
Program	Region 1			Region 2			Region 3			Region 4			Region 5		
	2017	2018	Change Percent Change MY FY17 to MY FY18	2017	2018	Change Percent Change MY FY17 to MY FY18	2017	2018	Change Percent Change MY FY17 to MY FY18	2017	2018	Change Percent Change MY FY17 to MY FY18	2017	2018	Change Percent Change MY FY17 to MY FY18
CAA 112(f)	9	2	-7 -77.78%	14	6	-8 -57.14%	28	30	2 -7.14%	17	9	-8 -47.06%	13	9	-4 -30.77%
CAA Asbestos Demolition and Removal	0	0	-0 -	1	0	-1 -100.00%	9	0	-9 -100.00%	9	2	-7 -77.78%	0	0	0 -
CAA Mobile Sources	0	0	-0 -	0	4	100.00%	33	16	-17 -51.52%	0	0	0 -	0	4	100.00%
CAA Stationary Source FCEs	7	4	-3 -42.86%	10	8	80.00%	10	10	0 -	10	10	100.00%	4	3	-1 -100.00%
CAA Stationary Source PCEs	348	27	-321 -92.24%	23	40	17 73.91%	12	7	-5 -41.67%	18	10	-8 -44.44%	155	100	-55 -35.48%
CWA 311 FRP	6	3	-30.00%	13	3	-10 -76.92%	6	8	2 33.33%	19	18	-1 -5.26%	0	0	0 -
CWA 311 SPCCC	21	11	-10 -47.62%	28	9	-19 -67.85%	20	8	-12 -60.00%	24	28	4 16.67%	9	3	-6 -66.67%
CWA 311 Spill IUs	0	0	-0 -	0	0	0 0.00%	0	0	0 -	0	1	100.00%	0	0	0 -
CWA Pre-treatment IUs	4	4	0 0.00%	8	8	0 0.00%	3	0	-3 -100.00%	0	7	70.00%	0	2	2 100.00%
CWA Section 404 Wetlands	3	3	0 0.00%	6	2	-4 -66.67%	21	15	-6 -28.57%	11	2	-9 -81.82%	3	2	-1 -33.33%
EFPCA 313 Non-Data Quality	4	5	1 25.00%	9	10	1 11.11%	1	-1 -100.00%	1	2	1 100.00%	0	0	0 -	
EFPCA non 313	9	0	-9 -100.00%	21	18	3 44.44%	8	5	-3 -37.50%	30	19	-11 -36.67%	1	1	100.00%
FIFRA (non GLP)	0	2	2 100.00%	9	18	9 100.00%	17	15	-1 -11.66%	5	2	40.00%	5	5	0 0.00%
FIFRA Good Laboratory Practices	0	0	-0 -	0	0	0 0.00%	9	0	-9 -100.00%	0	0	0 -	0	0	0 -
NPDES Majors	12	4	-8 -66.67%	50	56	6 12.00%	2	1	-1 -50.00%	5	7	15 114.29%	5	9	5 125.00%
NPDES Minors	33	32	-1 -3.03%	121	68	-53 -43.50%	5	17	12 24.00%	41	22	-19 -46.44%	4	9	2 -35.00%
Pretreatment IOTMs	2	0	-2 -100.00%	6	1	-5 -83.33%	3	5	2 66.67%	0	5	100.00%	1	0	-1 -100.00%
RTR HW	7	0	-7 -100.00%	73	90	17 23.91%	13	7	-6 -61.58%	115	108	-7 -6.09%	37	28	-9 -24.22%
RTR UST	8	2	-6 -75.00%	82	57	-25 -30.38%	9	19	10 111.11%	23	9	-14 -60.87%	36	12	50.00%
SDWA PWSS Inspection	0	0	-0 -	8	4	-4 -50.00%	1	0	-1 -100.00%	0	0	0 -	0	0	0 -
SDWA U/IU Inspection	0	0	-0 -	70	30	-40 -57.45%	23	18	-5 -21.74%	0	0	0 -	35	0	-35 -100.00%
TSCA AHRA	0	0	-0 -	0	0	0 -	3	2	-1 -33.33%	5	7	2 40.00%	0	1	1 100.00%
TSCA Core	9	4	-5 -55.56%	53	49	-4 -7.55%	3	2	-1 -33.33%	7	6	-1 -14.29%	1	0	-1 -100.00%
TSCA Lead	4	2	-2 -50.00%	10	4	-6 -60.00%	37	41	-4 -10.81%	79	61	-18 -22.78%	23	8	-15 -65.26%
TSCA PCBs	4	2	-2 -50.00%	10	4	-6 -60.00%	3	2	-1 -33.33%	47	50	-4 -80.00%	3	0	-3 -100.00%
Totals	486	105	-381 -78.40%	623	500	-123 -19.4%	288	245	-43 -14.93%	447	365	-82 -18.34%	335	217	-118 -35.22%

Compliance Inspections Change Mid-Year FY 17 to Mid-Year FY 18															
Program	Region 6			Region 7			Region 8			Region 9			Region 10		
	2017	2018	Change Percent Change MY FY17 to MY FY18	2017	2018	Change Percent Change MY FY17 to MY FY18									
CAA 112(f)	9	2	-7 -77.78%	14	6	-8 -57.14%	28	30	2 -7.14%	17	9	-8 -47.06%	13	9	-4 -30.77%
CAA Asbestos Demolition and Removal	0	0	-0 -	1	0	-1 -100.00%	9	0	-9 -100.00%	9	2	-7 -77.78%	0	0	0 -
CAA Mobile Sources	0	0	-0 -	0	4	100.00%	33	16	-17 -51.52%	0	0	0 -	0	4	100.00%
CAA Stationary Source FCEs	7	4	-3 -42.86%	10	8	80.00%	10	10	0 -	10	10	100.00%	4	3	-1 -100.00%
CAA Stationary Source PCEs	22	14	-8 -36.36%	7	1	-6 -83.71%	42	18	-24 -57.18%	1	0	-1 -100.00%	15	7	-8 -53.33%
CWA 311 FRP	87	42	-45 -51.72%	0	0	-0 -	0	1	-1 -100.00%	5	2	-66.67%	5	0	0 -
CWA 311 SPCCC	87	42	-45 -51.72%	14	4	-10 -71.43%	10	1	-9 -90.00%	20	4	-16 -80.00%	8	15	-7 -87.50%
CWA 311 Spill IUs	0	0	-0 -	0	0	-0 -	3	0	-1 -100.00%	0	0	0 -	0	0	0 -
CWA Section 404 Wetlands	18	13	-5 -27.78%	18	13	-5 -27.78%	5	6	1 20.00%	7	13	6 85.71%	0	0	0 -
EFPCA 313 Non-Data Quality	0	0	-0 -	1	0	-1 -100.00%	4	0	-4 -100.00%	3	0	-1 -100.00%	0	0	0 -
EFPCA non 313	1	0	-1 -100.00%	1	0	-1 -100.00%	1	2	1 100.00%	0	0	0 -	3	0	100.00%
FIFRA (non GLP)	4	4	0 0.00%	4	4	0 0.00%	1	2	1 100.00%	0	0	0 -	1	4	100.00%
FIFRA Good Laboratory Practices	0	0	-0 -	0	0	-0 -	22	6	-16 -72.73%	13	19	6 66.15%	2	1	-1 -50.00%
NPDES Majors	19	23	4 21.05%	41	44	-7 -17.89%	0	0	-0 -	0	0	0 0.00%	0	0	0 -
NPDES Minors	76	73	-3 -3.95%	44	30	-14 -31.82%	15	1	-14 -93.33%	32	17	-15 -46.88%	48	22	-26 -54.78%
Pretreatment IOTMs	0	0	-0 -	6	5	-1 -16.67%	2	4	2 100.00%	0	0	-1 -100.00%	0	0	0 -
RCR-AW	8	1	-7 -87.50%	64	82	20 28.13%	14	16	-6 -30.00%	17	0	-1 -100.00%	1	12	-2 -16.25%
RCR-AJST	11	11	0 0.00%	8	6	-2 -25.00%	0	1	-1 -100.00%	16	-1	-7 -75.31%	62	15	-47 -75.31%
SDWA PWSS Inspection	0	8	0 0.00%	0	0	-0 -	3	0	-3 -100.00%	57	5	-52 -91.33%	46	23	-23 -50.00%
SDWA UIC Inspection	157	41	-116 -7.89%	0	0	-0 -	1	57	56 56.00%	5	48	-43 -86.00%	0	0	0 -
SDWA AHRA	0	0	-0 -	0	0	-0 -	0	0	-0 -	0	0	0 -	0	0	0 -
TSCA Core	5	0	-5 -100.00%	22	5	22 22.73%	24	13	-11 -45.83%	45	37	-8 -25.00%	0	0	0 -
TSCA Lead	5	0	-5 -100.00%	0	0	-0 -	0	0	-0 -	0	0	0 -	0	0	0 -
TSCA PCBs	0	0	-0 -	0	0	-0 -	0	0	-0 -	0	0	0 -	0	0	0 -
Totals	534	273	-261 -48.83%	226	192	-34 -15.04%	155	135	-31 -18.67%	274	271	-176 -35.46%	24	26	2 8.33%

Compliance Inspections Change Mid-Year FY 17 to Mid-Year FY 18															
Program	Region 6			Region 7			Region 8			Region 9			Region HQ		
	2017	2018	Change Percent Change MY FY17 to MY FY18	2017	2018	Change Percent Change MY FY17 to MY FY18									
CAA 112(f)	9	2	-7 -77.78%	14	6	-8 -57.14%	28	30	2 -7.14%	17	9	-8 -47.06%	13	9	-4 -30.77%
CAA Asbestos Demolition and Removal	0	0	-0 -	1	0	-1 -100.00%	9	0	-9 -100.00%	9	2	-7 -77.78%	0	0	0 -
CAA Mobile Sources	0	0	-0 -	0	4	100.00%	33	16	-17 -51.52%	0	0	0 -	0	4	100.00%
CAA Stationary Source FCEs	7	4	-3 -42.86%	10	8	80.00%	10	10	0 -	10	10	100.00%	4	3	-1 -100.00%
CAA Stationary Source PCEs	22	14	-8 -36.36%	7	1	-6 -83.71%	42	18	-24 -57.18%	1	0	-1 -100.00%	15	7	-8 -53.33%
CWA 311 FRP	87	42	-												

